



Daniela Granata

Comdata S.p.A. – Senior Privacy Manager Comdata Group

Daniela is an experienced Privacy & GDPR Manager with a demonstrated history of working in the BPO industry. Skilled in Privacy Law, BPO, Management and General Data Protection Regulation (GDPR).

Daniela [REDACTED]. She graduated from the University of Pisa in Business Administration in 2000. Between October 2020 and July 2021, she attended the course in “Master of Personal Data Protection & Data Protection Designer ®”, final examination passed (<https://www.istitutoitalianoprivacy.it/albo-maestri-iip/>). Since 2014 she is certified TÜV - Privacy Officer.

Daniela is currently working as **Senior Privacy Manager at Comdata S.p.A.**
(January 2020 - Present).

She is responsible for:

- Privacy & GDPR Compliance for the Group's Italian companies.
- coordinating the privacy compliance for some of the European branches of the Group.
- managing and updating Comdata S.p.A. accountability system for GDPR and data protection.
- coordinating internal projects to support the business that impact on privacy compliance, in order to ensure the achievement of business objectives in compliance with the applicable regulatory framework.
- supporting the external DPO for supervisory activities on processing, data subject requests and data breaches;
- keeping and maintaining the "Record of Processing Activities" as Data Controller and Data Processor;
- drafting Data Protection Agreements with customers and suppliers;
- drafting, working daily with the external DPO and the CISO, DPIAs for new projects/activities;

- designing e-learning courses on GDPR for specific groups of the company population;
- participating, as audited function, in privacy & security audits of corporate clients on compliance with contracted DPAs.

Since July 2021 she is **member of the Group Compliance Committee**.

Between 2018 and 2019, Daniela has been **DPO Assistant at Comdata S.p.A.**

Member of the DPO Committee with the task of supporting the Comdata Spa Data Protection Officer (DPO) in carrying out the tasks and functions assigned to it, namely:

- inform and advise the Company on the obligations deriving from the GDPR, as well as other national or European Union provisions relating to data protection; among other things, collect information to identify the treatments carried out, analyze and verify the treatments in terms of data protection compliance;
- monitor compliance with the GDPR, other national or European Union provisions relating to data protection as well as the Company / Group policies regarding the protection of personal data, including the attribution of responsibilities, awareness and training of the staff participating in the treatments and related control activities;
- assess, for the purpose of adopting corrective measures and defining intervention priorities, the risks inherent in the treatments carried out by the Company, taking into account the nature, scope, context and purposes of the same treatments;
- act as a contact point with the Italian Data Protection Authority for questions related to the processing, including the prior consultation referred to in Article 36 of the GDPR, as well as cooperate with the Authority and, if necessary, consult it.

Between 2008 and 2018, Daniela has been **Privacy Manager at Comdata S.p.A.**

Her main responsibilities were:

- ensuring compliance and general governance of aspects relating to the processing of personal data in accordance with legal requirements (Privacy Code - Legislative Decree 196/2003 and Provisions of the Supervisory Authority);
- drafting internal documents (appointments, disclosures, etc.) necessary for the correct implementation of legal requirements inherent in company processes, external documents (client check lists, requests from the Supervisory Authority, etc.) on privacy aspects and issuing company guidelines on data protection;
- coordinating preparatory activities for audits of clients of BPO services on the correct handling of personal data managed for existing contracts and supporting the corporate areas involved in the audit phase;
- drafting and reviewing the privacy rules and annexes (e.g. appointments of officers, assessment checklists, etc.) contained in contracts with service procurers and suppliers;
- managing privacy requests made by internal departments;
- defining the content and methods of providing training on the subject;
- coordinating and carrying out auditing and control activities on compliance with corporate governance on the subject of Privacy.

Between 2003 and 2008, Daniela has been **Quality and Privacy Specialist** at **Comdata S.p.A.**.

Her main areas of practice were:

- implementation of Comdata S.p.A.'s Quality Management System according to ISO 9001:2000 and ISO 9001 2008 and conducting internal process audits;
- drafting and updating DPS (Data Security Policy Document) of Comdata Group companies pursuant to Legislative Decree 196/2003 (Privacy Code), statutory appointments and information notices;
- periodic assessment of the application of the minimum security measures relating to the processing of personal data of Comdata S.p.A. and/or service customers;
- preparation of material and provision of privacy training courses for internal managers and persons in charge of personal data processing;
- support to internal functions for the verification of privacy obligations
- coordination of an internal team for compliance with the ISO/IEC 27001:2005 Information Security Management Systems standard.

Between 2002 and 2003, Daniela has been **Quality Specialist** at **Intouch S.r.l. (Europ Assistance Group)**. Her main areas of practice were:

- implementation and enforcement of the Quality Management System;
- coordination and support of external third party consultants during annual internal audits.

Between May 2001 and December 2001, Daniela has been **Consulting** at **Modus Consulting S.r.l.**

Her main activities were:

- Implementing an American software for the management of the Quality System (QSI 9000), translation and testing of the software for the Italian market.

Daniela is very interested in new technologies and likes learning about new and challenging subjects. She enjoys spending time with her family and friends.



Daniela Grovato